

From: Brian L <mvmactech@gmail.com>
Sent: Tuesday, March 11, 2025 1:13 PM
To: Stephen Pfaff <spfaff@lccplaw.com>
Subject: Re: Langhammer

If my interpretation of the Rules is correct, disclosure protections already exist. Once the evidence is filed and trial is concluded, it's my understanding that the evidence will be part of the public record. After the trial, I am eager to publish my narrative of these events, so I'll want all materials available to me. So, I won't be signing a confidentiality agreement unless ordered to do so by the Court.

Eager to see those discovery materials.

-Brian Langhammer

On Tue, Mar 11, 2025 at 10:45 AM Stephen Pfaff <spfaff@lccplaw.com> wrote:

Brian—I will be sending u supplemental to interrogatories by tomorrow. As to the documents I am to produce to you, as I have said before they are ready to go. They are not due to you before 4/11/25 but of course I would like to get them to you before the 3/26/25 mediation.

However, I cannot produce same unless you sign the Confidentiality Agreement, which you have now had for two weeks. My clients have already signed it, and I am awaiting your signature.

If you wish to discuss this, please call me. Otherwise, I will file an expedited motion asking that the court enforce the confidentiality agreement.

Steve

From: Brian L <mvmactech@gmail.com>
Sent: Thursday, February 27, 2025 9:09 PM
To: Stephen Pfaff
Subject: Re: Langhammer

I need to review Rule 26.

I'll get back to you.

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Apple Certified Mac Technician

On Thu, Feb 27, 2025 at 1:58 PM Stephen Pfaff <spfaff@lccplaw.com> wrote:

Brian—I have TPD policies, and defendants training, personnel and disciplinary files ready to go. I need u to sign the attached Confidentiality Agreement, which I suggest to you is common in such litigation.

Please not—this document applies to all of the defendants as well. They, and I, have affixed our electronic signatures. We are not permitted to divulge, for example, your recently produced medical and employment/tax information, or any document information you produce.

Please call me if u have any questions.

Steve

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